

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRET NAGGS, MARK WOGSLAND, and
PETER ARMBRUSTER,

Defendants.

Case No. 18-CR-130

MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant Mark Wogsland, by his undersigned counsel, submits this motion for leave to file Exhibits B and C to Defendants' Reply Brief in Support of Motion to Dismiss the Superseding Indictment or, in the Alternative, for a *Kastigar* Hearing, to Suppress Grand Jury Testimony, For Disclosure of Grand Jury Materials, and For Leave to File Supplemental Briefing and Additional Pre-Trial Motions as Necessary ("Reply"), under seal. In support of this motion, Mr. Wogsland states as follows:

1. On December 18, 2019, Defendants filed their Reply in support of their request for dismissal of the Superseding Indictment (or certain alternative relief).
2. Exhibit B and Exhibit C to the Reply are documents containing information provided to Mr. Wogsland's counsel by Greenberg Traurig LLP and Wilmer Hale Pickering Hale and Dorr LLP, respectively.
3. Given the nature of this information and the documents' designation as "highly confidential," Mr. Wogsland requests that Exhibits B and C to the Reply be filed under seal so that any interested parties have an opportunity to address any concerns about confidentiality related to these documents.

WHEREFORE, Mr. Wogsland respectfully request that this Court grant Mr. Wogsland leave to file Exhibits B and C to Defendants' Reply under seal.

Respectfully submitted,

MARK WOGSLAND

By: /s/ Ryan S. Hedges
One of His Attorneys

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Dated: December 18, 2019

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on all attorneys of record in the above captioned case via the CM/ECF electronic filing system on December 18, 2019.

/s/ Ryan S. Hedges
Ryan S. Hedges